

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

No.05-10004-T

MARY CHRISTINE GREEN,

Defendant.

MOTION TO RESET REPORT DATE

Comes now the defendant, Mary Christine Green, by and through her court-appointed counsel of record, Michael J. Stengel, Esq., and moves this Court to reset the report date currently scheduled for Friday, April 29, 2005 at 8:45 a.m. In support thereof, defendant would show:

1. Defense counsel will be out of the office from April 27-30, 2005 attending the Sentencing Advocacy Workshop presented by the Administrative Office of the U.S. Courts' Defender Services Training Branch in Santa Monica, California.

2. Defense counsel is engaged in substantive settlement discussions with the United States. Earlier this week, AUSA Kitchen informed defense counsel that he couldn't prepare the proposed plea documents without further consultation with his case agent(s), who are apparently out of town through the end of next week, April 22, 2005.

MOTION GRANTED

DATE: 18 April 2005

James D. Todd

James D. Todd
U.S. District Judge

This document entered on the docket sheet in compliance
with Rule 55 and/or 32(b) FRCP on 4/19/05

FILED BY 8
05 APR 14 PM 2:52
ROBERT P. DI TROLO
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FILED BY 8
05 APR 18 PM 1:23
ROBERT P. DI TROLO
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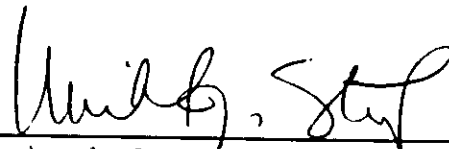
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3. Absent any further delay, defense counsel anticipates that a substantive report and possible change of plea can be made to the Court during the week of May 2, 2005. Such report would enable the parties to keep the current May 9, 2005 trial setting in the unlikely event no plea agreement is reached.

4. Defense counsel has discussed this motion with AUSA Kitchen, who has no object to it being granted.

WHEREFORE, PREMISES CONSIDERED, defendant prays this Court grant her motion and reset her report date from April 29, 2005 to the week of May 2, 2005.

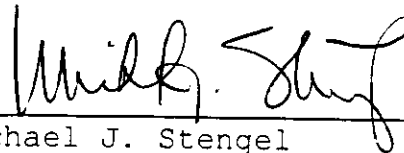
Respectfully submitted,



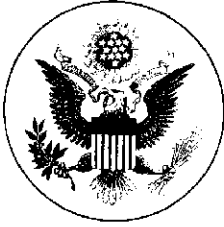
Michael J. Stengel (12860)
Attorney for Defendant
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(901) 527-3535

Certificate of Service

I hereby certify that I have served a copy of the foregoing upon Mr. Jerry Kitchen, 109 S. Highland Ave., Suite 300, Jackson, Tennessee 38301, this 14th day of April, 2005.



Michael J. Stengel



Notice of Distribution

This notice confirms a copy of the document docketed as number 25 in case 1:05-CR-10004 was distributed by fax, mail, or direct printing on April 19, 2005 to the parties listed.

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Jerry R. Kitchen
U.S. ATTORNEY
109 S. Highland Ave.
Jackson, TN 38301

Honorable James Todd
US DISTRICT COURT